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 AMERICAN AUTOMOBILE ASSOCIATION,
 7 INC.

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 OAKLAND DIVISION

11 AMERICAN AUTOMOBILE
 ASSOCIATION, INC., a Connecticut
 12 corporation,

13 Plaintiff,

14 vs.

15 TEMPLE MYRON EARLE, JR., an
 individual doing business as AAA
 16 MICHAEL TILLES BAIL BOND
 SERVICE, an entity of unknown form;
 17 AAA MICHAEL TILLES BAIL BOND
 SERVICE, an entity of unknown form;
 18 and DOES 1 through 10, Inclusive,

19 Defendants.

CASE NO.

008-03969 EMC

COMPLAINT FOR:

1. FEDERAL SERVICE MARK INFRINGEMENT [15 U.S.C. § 1114(1)(a) AND (b)];
2. FALSE DESIGNATION OF ORIGIN [15 U.S.C. § 1125(a)];
3. TRADE NAME OR SERVICE MARK DILUTION [15 U.S.C. § 1125(c)(1)];
4. INJURY TO BUSINESS REPUTATION AND DILUTION [CAL. BUS. & PROF. CODE § 14330];
5. UNFAIR AND DECEPTIVE TRADE PRACTICES [CAL. BUS. & PROF. CODE § 17000 *et seq.*]; AND
6. COMMON LAW UNFAIR COMPETITION AND TRADEMARK INFRINGEMENT

24 Plaintiff American Automobile Association, Inc. (hereinafter "Plaintiff"), for
 25 its complaint against the above-named defendants, alleges as follows:

26 **JURISDICTION AND VENUE**

- 27 1. This Court has jurisdiction under 28 U.S.C. section 1338(a) as this

1 action arises under the Lanham Act, 15 U.S.C. sections 1114, 1125(a), and
2 1125(c)(1) as well as under pendent jurisdiction under 28 U.S.C. section 1367.

3 2. This Court also has jurisdiction under 28 U.S.C. section 1332 because
4 Plaintiff and defendants are citizens of different states, and the matter in controversy
5 exceeds \$75,000, exclusive of interest and costs.

6 3. Venue is proper in the Northern District of California under 28 U.S.C.
7 section 1391(b) and (c) because defendants reside in this judicial district, a
8 substantial part of the events, omissions and acts that are the subject matter of this
9 action occurred within the Northern District of California, and defendants are
10 subject to personal jurisdiction and may be found in this district.

11 **PARTIES**

12 4. Plaintiff is a corporation organized and existing under the laws of the
13 State of Connecticut, located and doing business at 1000 AAA Drive, Heathrow,
14 Florida.

15 5. On information and belief, defendant Temple Myron Earle, Jr.
16 ("Earle") is an individual residing in this judicial district and doing business as AAA
17 Michael Tilles Bail Bond Service.

18 6. On information and belief, defendant AAA Michael Tilles Bail Bond
19 Service is an entity of unknown form doing business in this judicial district at 871
20 Emerald Avenue, San Leandro, CA 94577.

21 7. On information and belief, Plaintiff alleges that each of the defendants
22 named herein as Does 1 through 10, inclusive, performed, participated in, or abetted
23 in some manner, the acts alleged herein, proximately caused the damages alleged
24 below, and are liable to Plaintiff for the damages and relief sought herein.

25 8. On information and belief, Plaintiff alleges that, in performing the acts
26 and omissions alleged herein, and at all times relevant hereto, each of the defendants
27 was the agent and employee of each of the other defendants and was at all times
28 acting within the course and scope of such agency and employment with the

1 knowledge and approval of each of the other defendants.

2 9. The identities of the individuals and entities named as Doe defendants
3 herein are not presently known, but Plaintiff will seek to amend the Complaint to
4 properly identify them when their proper names have been ascertained.

5 **NATURE OF THE CASE**

6 10. Plaintiff seeks injunctive relief, damages, attorneys' fees, and costs
7 against defendants for service mark infringement under 15 U.S.C. section
8 1114(1)(a) and (b); false designation of origin and/or sponsorship under 15 U.S.C.
9 section 1125(a); dilution under 15 U.S.C. section 1125(c); injury to business
10 reputation and dilution under California Business and Professions Code section
11 14330; unfair and deceptive trade practices under California Business and
12 Professions Code sections 17000 *et seq.*; and common law palming off, trademark
13 and trade name infringement, and unfair competition.

14 **FACTUAL ALLEGATIONS COMMON TO ALL COUNTS**

15 11. Plaintiff is the owner of the famous AAA mark, U.S. service mark
16 registration No. 829,265, used in connection with a number of services, including
17 but not limited to providing bail bonds. A copy of this registration is attached hereto
18 as Exhibit A.

19 12. Plaintiff is the owner of numerous other famous registered trademarks
20 incorporating the AAA mark in the United States and throughout the world.

21 13. Plaintiff has been providing services under the AAA mark of
22 Registration No. 829,265 for more than 100 years.

23 14. Plaintiff, by virtue of the services offered under its AAA marks, is
24 recognized throughout the world as a provider of motor vehicle services, including
25 emergency road services.

26 15. On information and belief, at all relevant times hereto, defendants have
27 been and are in business using the AAA marks providing bail bonds. On
28 information and belief, defendants use the AAA marks in conducting and promoting

1 their business, including, without limitation, by prominently displaying trade names
 2 incorporating the AAA marks on their business premises, in their signage, in their
 3 stationery, in telephone and online directory listings, and in various other marketing
 4 materials.

5 16. Defendants have never been authorized to use the AAA marks in
 6 connection with their goods or services, nor have defendants been affiliated with
 7 Plaintiff.

8 17. Plaintiff sent a cease-and-desist letter to defendants on July 23, 2008,
 9 giving notice of Plaintiff's ownership of federally registered service marks and
 10 demanding that defendants immediately cease and desist from all uses of the AAA
 11 marks in connection with their goods and services. Defendants did not respond to
 12 the letter.

13 18. Plaintiff's counsel also called defendants by telephone on or about July
 14 30, 2008, and left a voicemail message asking Earle to return the phone call. The
 15 phone call went unreturned.

16 **FIRST CLAIM FOR RELIEF**

17 **(Federal Service Mark Infringement – 15 U.S.C. § 1114(1)(a) and (b))**

18 19. Plaintiff repeats and incorporates herein by reference each and every
 19 allegation contained in Paragraphs 1 through 18 above, inclusive, as though fully set
 20 forth herein.

21 20. Plaintiff is the owner of a number of federal trademark and service
 22 mark registrations that incorporate the AAA marks and specifically asserts
 23 ownership of the following:

24 <u>Registration No.</u>	<u>Mark</u>	<u>Date of Registration</u>
25 829,265	AAA	May 23, 1967

26 21. Plaintiff first used the AAA mark of registration No. 829,265 in
 27 connection with providing bail bonds at least as early as 1916 and has continued and
 28 expanded use thereof up to the present. Thus, long before the acts complained of

1 herein, members of the general consumer population in the United States and across
2 the world have recognized the AAA mark as an exclusive source identifier for bail
3 bonds originating from Plaintiff. The registration for the AAA mark is incontestable
4 under section 15 of the Lanham Act, 15 U.S.C. section 1065, and it constitutes
5 conclusive evidence of Plaintiff's exclusive right to use the AAA mark in
6 connection with emergency road service.

7 22. Plaintiff's registered service mark identified above is valid and
8 subsisting and remains in full force and effect as evidence of the validity thereof and
9 Plaintiff's ownership of the mark in connection with the services specified in the
10 registration.

11 23. As a result of the long period of use and extensive advertisement and
12 sale of services under the AAA mark, members of the general consumer population
13 in the United States and across the world recognize the AAA marks as exclusive
14 source identifiers for bail bonds originating from Plaintiff.

15 24. Defendants' use of the AAA mark in interstate commerce in connection
16 with their goods and services is causing and will continue to cause a likelihood of
17 confusion, mistake, and deception with respect to: (a) the source and origin of the
18 goods and services offered by defendants; (b) the affiliation, connection, and
19 association of Plaintiff with defendants; and (c) Plaintiff's sponsorship, approval,
20 and/or control of the goods and services offered by defendants, all in violation of the
21 Lanham Act, 15 U.S.C. section 1114(1)(a) and (b).

22 25. On information and belief, defendants are now committing the acts
23 complained of above and have continued to do so in defiance of Plaintiff's requests
24 that they cease such acts.

25 26. Defendants' acts and conduct constitute federal service mark
26 infringement that has caused and, unless restrained and enjoined by this Court, will
27 continue to cause a likelihood of consumer confusion, mistake, and deception.

28 27. On information and belief, defendants' acts of service mark

1 infringement in violation of the Lanham Act have caused financial injury and
2 damages to Plaintiff and have been willful, making this an exceptional case within
3 the meaning of the Lanham Act, 15 U.S.C. section 1117, thereby entitling Plaintiff
4 to damages, attorneys' fees, and costs.

5 28. Plaintiff is entitled to damages as a result of defendants' actions and
6 conduct and, because such damages alone do not provide Plaintiff with an adequate
7 remedy at law, Plaintiff is also entitled to injunctive relief.

8 **SECOND CLAIM FOR RELIEF**

9 **(Unfair Competition by False Designation of Origin – 15 U.S.C. § 1125(a))**

10 29. Plaintiff repeats and incorporates herein by reference each and every
11 allegation contained in Paragraphs 1 through 28 above, inclusive, as though fully set
12 forth herein.

13 30. Defendants, either independently or through collaboration with one
14 another, are using the AAA mark in connection with their goods and services.

15 31. On information and belief, defendants use the AAA mark in commerce,
16 which use has been done with the deliberate intent of capitalizing and trading on the
17 good will and reputation of Plaintiff.

18 32. The use in commerce of the AAA mark by defendants will tend to
19 cause and, on information and belief, has caused the relevant public and trade to
20 believe erroneously that defendants' services are associated, authorized, sponsored,
21 or controlled by Plaintiff.

22 33. Defendants' use in commerce of the AAA mark in connection with
23 their goods and services constitutes a false designation of the origin and/or
24 sponsorship of such goods and services and falsely describes and represents such
25 goods and services.

26 34. By their acts as alleged herein, defendants have falsely designated and
27 represented goods and services sold in commerce in violation of 15 U.S.C. section
28 1125(a) and have otherwise used the good will of Plaintiff to sell defendants' own

1 goods and services and have otherwise competed unfairly with Plaintiff.

2 35. On information and belief, defendants are now committing the acts
3 complained of above and have continued to do so in defiance of Plaintiff's request
4 that they cease such acts.

5 36. Defendants, after due notice, have displayed a willful course of conduct
6 toward appropriation and destruction of Plaintiff's rights in and to the AAA mark.

7 37. Defendants' wrongful acts and conduct as alleged herein have
8 permitted or will permit them to generate substantial sales and profits on the
9 strength of Plaintiff's substantial advertising, sales, consumer recognition, and good
10 will in connection with the AAA mark.

11 38. As a result of defendants' wrongful acts alleged herein, Plaintiff has
12 suffered and will continue to suffer monetary damage in an amount not thus far
13 determined.

14 39. On information and belief, defendants' acts of unfair competition by
15 false designation of origin in violation of the Lanham Act have caused financial
16 injury and damages to Plaintiff and have been willful, making this an exceptional
17 case within the meaning of the Lanham Act, 15 U.S.C. section 1117, thereby
18 entitling Plaintiff to damages, attorneys' fees, and costs.

19 40. Defendants' acts and conduct constitute unfair competition that has
20 caused and, unless restrained and enjoined by this Court, will continue to cause
21 irreparable harm, damage, and injury to Plaintiff's good will and business
22 reputation.

23 41. Plaintiff is entitled to damages as a result of defendants' actions and
24 conduct and, because such damages alone do not provide Plaintiff with an adequate
25 remedy at law, Plaintiff is entitled to injunctive relief.

26 **THIRD CLAIM FOR RELIEF**

27 **(Trade Name or Service Mark Dilution – 15 U.S.C. § 1125(c)(1))**

28 42. Plaintiff repeats and incorporates herein by reference each and every

1 allegation contained in Paragraphs 1 through 41 above, inclusive, as though fully set
2 forth herein.

3 43. Plaintiff's AAA mark was used in commerce long before defendants'
4 adoption and use of the AAA mark in connection with their goods and services.

5 44. Plaintiff's AAA mark has become famous because of long, extensive,
6 continuous, and exclusive use by Plaintiff in connection with providing bail bonds,
7 such fame occurring long before defendants' adoption and use of the AAA mark in
8 connection with their goods and services.

9 45. Defendants use the AAA mark in promoting their goods and services in
10 the same trade areas and channels of trade in which Plaintiff's AAA mark is
11 recognized and famous.

12 46. On information and belief, defendants' use of the AAA marks has
13 lessened the capacity of Plaintiff's famous AAA trade name and service marks to
14 identify and distinguish Plaintiff's goods and services.

15 47. Defendants' acts and conduct as alleged herein have tarnished the
16 reputation and recognition of Plaintiff's famous AAA trade name and service marks
17 by the low quality of defendants' goods and services.

18 48. On information and belief, defendants' acts of trade name or service
19 mark dilution in violation of the Lanham Act have caused financial injury and
20 damages to Plaintiff and have been willful, making this an exceptional case within
21 the meaning of the Lanham Act, 15 U.S.C. section 1117, thereby entitling Plaintiff
22 to damages, attorneys' fees, and costs.

23 49. Plaintiff has no adequate remedy at law and is being irreparably
24 damaged by dilution of its famous mark, in violation of 15 U.S.C. section 1125(c).
25 Therefore, Plaintiff is entitled to injunctive relief.

26 **FOURTH CLAIM FOR RELIEF**

27 **(Injury to Business Reputation and Dilution –**
28 **Cal. Bus. & Prof. Code § 14330)**

1 50. Plaintiff repeats and incorporates herein by reference each and every
 2 allegation contained in Paragraphs 1 through 49 above, inclusive, as though fully set
 3 forth herein.

4 51. Plaintiff is the owner of a mark that is distinctive and famous in the
 5 State of California.

6 52. On information and belief, defendants have used and continue to use
 7 the famous AAA mark after the mark became famous, which use dilutes the
 8 distinctive quality of Plaintiff's mark.

9 53. On information and belief, defendants' actions described herein were
 10 taken and continue to be taken with full knowledge that such actions would and do
 11 dilute the AAA mark and with the intention to cause dilution of the mark.

12 54. As a result of the actions described herein, defendants have caused, and
 13 unless restrained and enjoined by this Court, will continue to cause irreparable harm,
 14 damage, and injury to Plaintiff, including but not limited to injury to Plaintiff's good
 15 will and business reputation.

16 55. Plaintiff has no adequate remedy at law and is being irreparably
 17 damaged by defendants' acts in violation of California Business & Professions Code
 18 section 14330.

19 **FIFTH CLAIM FOR RELIEF**

20 **(Unfair and Deceptive Trade Practices –**

21 **Cal. Bus. & Prof. Code § 17000 *et seq.*)**

22 56. Plaintiff repeats and incorporates herein by reference each and every
 23 allegation contained in Paragraphs 1 through 55 above, inclusive, as though fully set
 24 forth herein.

25 57. The acts and practices of defendants as alleged herein violate the
 26 California Uniform Unfair and Deceptive Trade Practices Act, California Business
 27 & Professions Code section 17000 *et seq.*, because (a) the actions and conduct of
 28 defendants cause a likelihood of consumer confusion or misunderstanding as to the

1 source, sponsorship, approval, or certification of services, (b) the actions and
2 conduct of defendants cause a likelihood of consumer confusion or
3 misunderstanding as to affiliation, connection, or association with or certification by
4 another, and (c) the actions and conduct of defendants create other likelihood of
5 consumer confusion or misunderstanding.

6 58. The acts and practices of defendants as alleged herein significantly
7 threaten or harm consumers.

8 59. Defendants' acts have caused damage to Plaintiff, including incidental
9 and general damages, lost profits, and out-of-pocket expenses.

10 60. Defendants have profited and in the future will profit unjustly from
11 their unjust business practices. Accordingly, pursuant to Business and Professions
12 Code section 17203, Plaintiff seeks an award representing the amount of ill-gotten
13 gains that must be disgorged by defendants. Defendants should therefore be
14 required to disgorge and restore to Plaintiff all profits and other expenses as may be
15 incurred by Plaintiff.

16 61. As a result of the acts alleged herein, defendants have caused, and
17 unless restrained and enjoined by this Court, will continue to cause irreparable harm,
18 damage, and injury to Plaintiff, including but not limited to injury to Plaintiff's good
19 will and business reputation. Plaintiff therefore has no adequate remedy at law and
20 is also entitled to injunctive relief.

21 **SIXTH CLAIM FOR RELIEF**

22 **(Common Law Palming Off, Trade Name and Trademark Infringement,**
23 **and Unfair Competition)**

24 62. Plaintiff repeats and incorporates herein by reference each and every
25 allegation contained in Paragraphs 1 through 61 above, inclusive, as though fully set
26 forth herein.

27 63. Defendants' actions and conduct as alleged herein constitute palming
28 off their services as Plaintiff's services offered under the famous AAA mark.

1 64. Such actions and conduct by defendants constitute unfair competition
2 under California common law.

3 65. Defendants' actions and conduct in adopting and using the AAA mark
4 in California constitute trademark infringement under California common law.

5 66. Defendants have caused and, unless restrained and enjoined by this
6 Court, will continue to cause irreparable harm, damage, and injury to Plaintiff,
7 including but not limited to injury to Plaintiff's good will and business reputation.

8 67. Plaintiff has no adequate remedy at law, and Plaintiff is being
9 irreparably damaged by defendants' acts in violation of California common law,
10 entitling Plaintiff to injunctive relief.

11 68. Defendants' actions and conduct as alleged herein are malicious and
12 fraudulent and entitle Plaintiff to punitive damages under Civil Code section 3294.

13 **PRAYER FOR RELIEF**

14 WHEREFORE, Plaintiff prays for an order and judgment against defendants,
15 and each of them, as follows:

16 1. That defendants, and each of them, their officers, directors, partners,
17 agents, servants, employees, attorneys, confederates, and all persons acting for,
18 with, by, through or under them, and any others within their control or supervision,
19 and all others in active concert or participation with the above, be enjoined during
20 the pendency of this action and permanently thereafter from using the designation
21 "AAA" or any other name or mark incorporating Plaintiff's service marks, either
22 alone or in combination with other words or symbols, in the marketing, sales,
23 distribution, promotion, advertising, identification, or in any other manner in
24 connection with providing bail bonds and other related services at any locality in the
25 United States;

26 2. That defendants, and each of them, their officers, directors, partners,
27 agents, servants, employees, attorneys, confederates, and all persons acting for,
28 with, by, through or under them, and any others within their control or supervision,

1 and all others in active concert or participation with the above, be enjoined during
2 the pendency of this action and permanently thereafter from using the designation
3 “AAA” or any other name or mark incorporating Plaintiff’s service marks in any
4 form or manner that would tend to identify or associate defendants’ businesses or
5 services with Plaintiff in the marketing, sale, distribution, promotion, advertising,
6 identification, or in any other manner in connection with any business;

7 3. That defendants, and each of them, their officers, directors, partners,
8 agents, servants, employees, attorneys, confederates, and all persons acting for,
9 with, by, through or under them, and any others within their control or supervision,
10 and all others in active concert or participation with the above, be enjoined during
11 the pendency of this action and permanently thereafter from referring to their
12 businesses as “triple A” (either orally or in writing) in the marketing, sale,
13 distribution, promotion, advertising, identification, or in any other manner in
14 connection with any business;

15 4. That defendants, and each of them, their officers, directors, partners,
16 agents, servants, employees, attorneys, confederates, and all persons acting for,
17 with, by, through or under them, and any others within their control or supervision,
18 and all others in active concert or participation with the above, be enjoined during
19 the pendency of this action and permanently thereafter from representing to anyone
20 (either orally or in writing) that their businesses are affiliated with Plaintiff in any
21 way or is an AAA agent or contractor unless their businesses are approved by
22 Plaintiff to be an AAA agent or contractor;

23 5. For an order requiring defendants to deliver to Plaintiff’s attorney
24 within thirty (30) days after the entry of any preliminary or permanent injunction, to
25 be impounded or destroyed by Plaintiff, all literature, signs, labels, prints, packages,
26 wrappers, containers, advertising materials, stationery, and any other items in their
27 possession or control that contain the infringing designation “AAA” or any other
28 name or mark incorporating Plaintiff’s service marks, either alone or in combination

1 with other words and symbols;

2 6. For an order requiring defendants to remove from their business
3 premises within thirty (30) days after the entry of any preliminary or permanent
4 injunction, all instances of the "AAA" designation, and to destroy all molds, plates,
5 masters, or means of creating the infringing items;

6 7. For an order requiring defendants to instruct, within thirty (30) days
7 after the entry of any preliminary or permanent injunction, any print directory,
8 Internet directory, or website that they have caused to carry the AAA mark,
9 including, without limitation, any reference to their fictitious business names
10 containing the "AAA" designation or other infringing designation, to cease using
11 such names at the earliest possible date;

12 8. For an order requiring defendants to cancel all fictitious name
13 registrations and licenses of any type that consist of or were issued to an entity with
14 the "AAA" designation in its name;

15 9. For an order requiring defendants: (1) to relinquish any Internet domain
16 names in their possession that contain the "AAA" mark and transfer rights to such
17 domain names to Plaintiff; and (2) to refrain from using any other Internet domain
18 name that incorporates the "AAA" mark;

19 10. For an order requiring defendants to file with the Clerk of this Court
20 and serve Plaintiff, within thirty (30) days after the entry of any preliminary or
21 permanent injunction, a report in writing, under oath, setting forth in detail the
22 manner and form in which defendants have complied with 1 through 9 above;

23 11. For an order requiring defendants to account for all profits made by
24 defendants and to hold all such profits in constructive trust for the benefit of
25 Plaintiff;

26 12. For an award of defendants' profits and Plaintiff's damages in an
27 amount not yet ascertained but believed to exceed \$500,000;

28 13. For an award of three times Plaintiff's damages or defendants' profits

1 in view of the intentional and willful nature of defendants' acts, pursuant to 15
2 U.S.C. section 1117;

3 14. For an award of punitive damages according to proof;

4 15. For an award of reasonable attorneys' fees under 15 U.S.C.
5 section 1117;

6 16. For an award of pre- and post-judgment interest at the highest rate
7 allowed by law;

8 17. For an award of costs and disbursements incurred in this action; and

9 18. For such further relief as this Court shall deem just and proper.

10
11 Dated: August 18, 2008

RUTAN & TUCKER, LLP
MICHAEL T. HORNAK
MICHAEL ADAMS

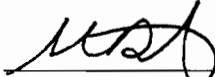
13 By: 
14 Michael Adams
15 Attorneys for Plaintiff
16 AMERICAN AUTOMOBILE
ASSOCIATION, INC.

EXHIBIT 1



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Typed Drawing

Word Mark Goods and Services	<p>AAA</p> <p>IC 042. US 100. G & S: AUTOMOBILE ASSOCIATION SERVICES RENDERED TO MOTOR VEHICLE OWNERS, MOTORISTS, AND TRAVELERS GENERALLY-NAMELY, OBTAINING MOTOR VEHICLE LICENSE PLATES AND TITLE CERTIFICATES; SPONSORING SCHOOL SAFETY PATROLS; ADVOCATING LEGISLATION FAVORABLE TO SAFE AND ECONOMICAL MOTOR VEHICLE TRAVEL, OPERATION, AND MAINTENANCE; CONDUCTING MOTOR VEHICLE TESTS AND MAKING TESTS OF AUTOMOTIVE AND RELATED PRODUCTS; AND RATING TOURIST ACCOMMODATIONS. FIRST USE: 19030000. FIRST USE IN COMMERCE: 19030000</p> <p>IC 035. US 101. G & S: ARRANGING FOR DISCOUNT PURCHASES, COLLECTING DAMAGE CLAIMS; OFFERING REWARDS FOR INFORMATION LEADING TO ARREST AND CONVICTION OF PERSONS STEALING MEMBERS' AUTOMOBILES; AND PLACING INSURANCE WITH UNDERWRITERS. FIRST USE: 19160000. FIRST USE IN COMMERCE: 19160000</p> <p>IC 036. US 102. G & S: PROVIDING BAIL BOND. FIRST USE: 19160000. FIRST USE IN COMMERCE: 19160000</p> <p>IC 037. US 103. G & S: PROVIDING EMERGENCY ROAD SERVICE. FIRST USE: 19160000. FIRST USE IN COMMERCE: 19160000</p> <p>IC 039. US 105. G & S: DISSEMINATING TRAVEL INFORMATION AND MAKING TRAVEL ARRANGEMENTS. FIRST USE: 19020000. FIRST USE IN COMMERCE: 19020000</p> <p>IC 041. US 107. G & S: TEACHING MOTOR VEHICLE OPERATION; CONDUCTING TRAFFIC AND PEDESTRIAN SAFETY CAMPAIGNS, AND GIVING TRAFFIC SAFETY LESSONS. FIRST USE: 19240000. FIRST USE IN COMMERCE: 19240000</p>
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Mark Drawing Code (1) TYPED DRAWING

Serial Number 72230991

Filing Date October 22, 1965

Current Filing Basis 1A

Original Filing Basis 1A
Published for Opposition March 7, 1967
Registration Number 0829265
Registration Date May 23, 1967
Owner (REGISTRANT) AMERICAN AUTOMOBILE ASSOCIATION, INC. CORPORATION CONNECTICUT
1000 AAA DRIVE HEATHROW FLORIDA 32746
Attorney of Record LAWRENCE E. LAUBSCHER, JR.
Prior Registrations 0547321,0703556
Type of Mark SERVICE MARK
Register PRINCIPAL
Affidavit Text SECT 15. SECTION 8(10-YR) 20061121.
Renewal 2ND RENEWAL 20061121
Live/Dead Indicator LIVE

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